



# STATE OF IOWA

TERRY E. BRANSTAD, GOVERNOR  
KIM REYNOLDS, LT. GOVERNOR

DEPARTMENT OF HUMAN SERVICES  
CHARLES M. PALMER, DIRECTOR

## INFORMATIONAL LETTER NO. 983

**DATE:** March 31, 2011

**TO:** Iowa Medicaid Home Health, Hospice, Medical Equipment and Physician Providers

**FROM:** Iowa Department of Human Services, Iowa Medicaid Enterprise (IME)

**RE:** Medicare Requirement – Physician Face to Face Encounter

**EFFECTIVE:** Upon Receipt

This notice serves to clarify the question of whether Iowa Medicaid enrolled home health, hospice and medical equipment providers must follow the Medicare face to face physician requirements published in the Federal Register Final Rule dated November 17, 2010.

The answer is yes. All Iowa Medicaid home health, hospice and medical equipment providers must be Medicare certified per Iowa Administrative Code (IAC) standards [441- IAC 78.9(249A), 441 - IAC 78.10(249A; and 441 - IAC 72.32(249A)].

Iowa Medicaid standards do not specifically define the physician face to face requirement; therefore; 441 – IAC 78.9(1) applies in this scenario. This standard states that Medicare definitions and policies shall apply to Medicaid services provided unless specifically defined differently.

All of the IAC standards cited above combine to require Iowa Medicaid's home health, hospice and medical equipment agencies to implement the Medicare face to face physician requirement beginning January 1, 2011 and continuing through the first calendar quarter. Beginning April 1, 2011, CMS stated that its expectation is that home health, hospice and medical equipment agencies will have fully established internal protocols and procedures to insure compliance with the standard including the documentation of the physician face to face encounter [http://www.cms.gov/HomeHealthPPS/Downloads/hill\\_notification\\_face\\_to\\_face.pdf](http://www.cms.gov/HomeHealthPPS/Downloads/hill_notification_face_to_face.pdf). Iowa Medicaid's expectation is the same as that of the CMS expectation stated in this paragraph.

Valuable updates and clarifications regarding this face to face physician requirement may be accessed at the following websites:

<http://www.cms.gov/MLN MattersArticles/downloads/SE1038.pdf>  
<http://www.cms.gov/center/hha.asp>

If you have any questions, please contact the IME Provider Services Unit at 1-800-338-7909, locally (in Des Moines), or by e-mail at [imeproviderservices@dhs.state.ia.us](mailto:imeproviderservices@dhs.state.ia.us)